

**IN UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

	X
	:
In re:	:
	:
BRICKCHURCH ENTERPRISES, INC.,	Chapter 11
	:
	:
Debtor.	Case No. 22-70914-ast
	:
	:
X	

**DEBTOR'S NOTICE AND STATEMENT OF PAYMENT OF PREPETITION
SECURED LENDER AND ASSIGNMENT IN COMPLIANCE WITH
ORDER GRANTING DEBTOR'S MOTION FOR ORDER AUTHORIZING
PAYMENT OF THE UNDISPUTED SECURED CLAIM AMOUNT
ASSERTED BY DEBTOR'S PREPETITION SECURED LENDER**

Brickchurch Enterprises, Inc. (the “**Debtor**”) by and through its counsel, hereby files this notice and statement (the “**Statement**”) in compliance with *Order Granting Debtor’s Motion for Order Authorizing Payment of the Undisputed Secured Claim Amount Asserted by Debtor’s Prepetition Secured Lender* [Dkt. No. 170] (the “**Payoff Order**”). In support of this Statement, the Debtor respectfully represents as follows:

NOTICE AND STATEMENT

1. On December 9, 2022 (“**Closing Date**”), the Debtor closed on the post-petition financing approved by the Court pursuant to the *Order (I) Authorizing Debtor to Obtain Post-Petition Secured Financing Pursuant to 11 U.S.C. §§ 105, 361, 362 and 364, and (II) Granting Liens and Super-Priority Claims* [Dkt. No. 172] (“**DIP Financing Order**”) and/or DIP Loan Agreement.¹
2. On the Closing Date, Debtor’s pre-petition secured lender JGB Partners, LP, JGB Capital, LP, JGB (Cayman) Ancona, Ltd., JGB Plymouth Rock, LLC (collectively, “**JGB**”) was

¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the DIP Financing Order.

paid the \$44.5 million Settlement Amount and the Assignment contemplated under the Payoff Order and DIP Financing Order was effectuated.

3. The Debtor hereby certifies that the requirements of the Payoff Order have been satisfied.

Dated: December 12, 2022

Respectfully submitted,

SIMMONS LEGAL PLLC

/s/ Camisha L. Simmons

Camisha L. Simmons

SIMMONS LEGAL PLLC

1330 Avenue of the Americas, Suite 23A
New York, New York 10019

212.653.0667 (Telephone- New York)

214.643.6192 (Telephone- Dallas)

800.698.9913 (Facsimile)

Email: camisha@simmonslegal.solutions

COUNSEL FOR DEBTOR

CERTIFICATE OF SERVICE

I certify that on December 12, 2022 a true and correct copy of the foregoing Notice and Statement was served electronically upon all parties of record through the Court's Electronic Case Filing System on those parties that have consented to such service.

SIMMONS LEGAL PLLC

/s/ Camisha L. Simmons

Camisha L. Simmons

SIMMONS LEGAL PLLC

1330 Avenue of the Americas, Suite 23A

New York, New York 10019

212.653.0667 (Telephone- New York)

214.643.6192 (Telephone- Dallas)

800.698.9913 (Facsimile)

Email: camisha@simmonslegal.solutions

COUNSEL FOR DEBTOR